

**HOGAN LOVELLS US LLP**

Jon Talotta (*admitted pro hac vice*)  
8350 Broad Street (Boro Tower)  
Tysons, VA 22102  
Telephone: (703) 610-6100  
jon.talotta@hoganlovells.com

David M. Cheifetz (*admitted pro hac vice*)  
Elizabeth Milburn (*pro hac vice pending*)  
390 Madison Avenue  
New York, New York 10017  
Tel: 212.918.3000  
david.cheifetz@hoganlovells.com  
tina.milburn@hoganlovells.com

**McCARTER & ENGLISH, LLP**

Christopher A. Rojao  
Ryan M. Savercool  
Four Gateway Center  
100 Mulberry St.  
Newark, NJ 07102  
Telephone: (973) 639-8486  
Facsimile: (973) 297-3764  
crojao@mccarter.com  
rsavercool@mccarter.com

*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PROTECTION, *et al.*,

Plaintiffs,

v.

THE LIFETIME VALUE CO. LLC., *et al.*,

Defendants.

Civil Action No. No. 24-cv-4850-HB

Honorable Harvey Bartle, III, U.S.D.J.

**DEFENDANTS' MOTION FOR  
ADMISSION *PRO HAC VICE* OF  
ELIZABETH MILBURN, ESQ.**

Pursuant to Local Civil Rule 101.1(c), Christopher A. Rojao, counsel to the Lifetime Value Co. LLC, BeenVerified, Inc.<sup>1</sup>, BeenVerified, LLC, NeighborWho LLC, the NumberGuru,

<sup>1</sup> BeenVerified, Inc. is no longer in existence.

LLC, PeopleLooker LLC, PeopleSmart LLC, Ownerly, LLC (collectively the “Defendants”), and a member of the New Jersey Bar, moves for the admission *pro hac vice* of Elizabeth Milburn, Esq.

Ms. Milburn will be associated with me in the defense of this matter. I will be responsible for Ms. Milburn’s conduct during her admission *pro hac vice* and will ensure that *pro hac vice* counsel will comply with Local Civil Rule 101.1(c).

I, or another lawyer at McCarter & English, LLP, admitted to practice before this Court, will make all court appearances with *pro hac vice* counsel, unless excused by this Court. I, or another lawyer at McCarter & English, LLP, admitted to practice before this Court, will sign all pleadings, briefs and other papers filed with the Court.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Ms. Milburn’s Certification and Order are submitted herewith.

By: /s/ Christopher A. Rojao

Christopher A. Rojao, Esq.  
**McCARTER & ENGLISH, LLP**  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
Telephone: (973) 622-4444  
Facsimile: (973) 924-7070  
crojao@mccarter.com

*Attorneys for Defendants*

Dated: October 10, 2024